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1 CA, 2 GA, 3 ID,
4 MO, 5 NJ, 6 NY,
7 OR, 8 SC

May 1, 2025

VIA ECF

The Honorable Naomi Reice Buchwald
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 21A
New York, NY 10007-1312
BuchwaldNYSDChambers@nysd.uscourts.gov

Re: PCVA Jane Doe v. UMG Recordings, Inc. et. al., 25-CV-02745

Dear Judge Buchwald,

We write on behalf of Plaintiff, PCVA Jane Doe in the above-captioned matter requesting a pre-motion conference pursuant to Your Honor's Individual Rules of Practice. Specifically, Plaintiff seeks to file a motion to amend her complaint pursuant to F.R.C.P. 15(a)(2) to dismiss her claims against Defendant, UMG Recordings, Inc. ("UMG") and remove said defendant from the case caption, eliminate all allegations against UMG, and proceed with amended allegations against Defendant, Kevin Wesley Liles ("Liles") stemming from the rape of Plaintiff and excluding claims for harassment within the scope of Liles' employment. We have sought Defendants' consent for the aforementioned request, however, defense counsel for Liles does not consent to allowing us to file an amended complaint as against him.

As stated by this Court in Taylor v. Trigeno, No. 1:16-CV-1143-GHW, 2021 WL 6070444 at *2 (S.D.N.Y. Dec. 21, 2021), "Federal Rule of Civil Procedure 15(a)(2) requires that the Court 'freely give leave [to amend] when justice so requires.' Nonetheless, 'it is within the sound discretion of the district court to grant or deny leave to amend.'" (citing McCarthy v. Dun & Bradstreet Corp., 482 F.3d 184, 200 (2d Cir. 2007).

On Friday, April 25, 2025, defense counsel for Liles' requested an "urgent" meet and confer and, for the first time, provided our office with relevant information potentially bearing on Plaintiff's claims. Due to the sensitive nature of the information, Plaintiff respectfully requests a pre-motion conference with Your Honor where Plaintiff's counsel can advise the Court, *in-camera*, as to the recently disclosed information which is the basis for seeking to amend Plaintiff's complaint and the allegations as against Liles and dismiss her claims against UMG, only.

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May 1, 2025

In light of the foregoing, Plaintiff respectfully requests a pre-motion conference with Your Honor at the Court's convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "L.B. Franken".

Lucas B. Franken